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May 24, 2013

## BY ELECTRONIC MAIL

The Honorable Denise L. Cote United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: United States v. Zubair Tahir, 10 Cr. 923 (DLC)

Granted.

Mune Che Muy 29, 2013

Dear Judge Cote:

This letter is submitted on behalf of Zubair Tahir, whom this firm represents in the above-referenced matter, to request that the Court modify the terms of Mr. Tahir's supervised release to permit him to travel from the Southern District of New York to Houston, Texas, from June 3, 2013, through June 21, 2013, and again from July 1, 2013, through July 19, 2013. Mr. Tahir wishes to travel to Houston to attend job training for a new position he has obtained at Wheel Mart, a company located in Houston, Texas, and with outposts in both Texas and California.

I have been informed by Assistant United States Attorney Daniel Goldman that the government consents to this modification. I have also been informed by Angel Matos, Mr. Tahir's Pre-Trial Services Officer in New Jersey, and by Robert L. Trail, Deputy Chief of Pre-Trial Services in the Southern District of New York, that both Pre-Trial offices consent to this modification, in particular given that Mr. Tahir has been fully compliant to date and has traveled outside the U.S. while under Pre-Trial supervision on several occasions without incident.

If Mr. Tahir is allowed to make this trip, he will not be accompanied by his wife and daughter; they will remain In New Jersey, where he currently resides. In addition, while this position will likely require relocation, and both the government and the Pre-Trial offices in New York and New Jersey are aware of this fact, Mr. Tahir is not requesting permission to relocate at this time.

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Accordingly, it is respectfully requested that the Court modify the terms of Mr. Tahir's supervised release to permit him to travel from the Southern District of New York to Houston, Texas, from June 3, 2013, through June 21, 2013, and again from July 1, 2013, through July 19, 2013. As stated previously, both the government and the Pre-Trial Services Office consent to this request.

Respectfully submitted,

Joshua L. Dratel

JLD/lal

cc: Assistant United States Attorney Daniel Goldman (by electronic mail)